The cited references do not teach or suggest all of the limitations of the independent claims. Tavllaei teaches a system management module for a host server system, which includes a system management processor (SMP) connected to a system management local bus. The system management local bus connects to the system PCI bus through a system management central (SMC). The SMC includes the main arbitration unit for the PCI bus and also includes the arbiter for the for the system management local bus. The SMM includes a video controller and keyboard and mouse controller connected to the system management local bus to support remote consoling of the SMM. The SMC includes logic to monitor PCI cycles and to issue error signals in the event of a system error. The SMC also isolates failed components by masking request, grant, and interrupt lines for the failed device. Further, if a spare component is provided, the SMC permits dynamic switching to the spare.

Splett teaches a bus error injection circuit, which generates bus error to test proper operation of bus error detection and recovery in a system of modules interconnected by a synchronous digital bus. Application of the circuit is but error detection and recovery tests for a physical realization of the system. The bus error injection circuit can be replicated on a number of modules interconnected by a synchronous bus to provide multiple sources of error injection. One module, or multiple modules, with error injection circuitry is designated as the source(s) to inject a transient bus error. The bus error injection circuitry monitors the bus to determine when the module is a participant in a bus transfer cycle on the bus.

In contrast, Applicant teaches a mechanism and a method for testing device driver hardening. The testing of device driver hardening is recited in independent claim 1:

"A test mechanism <u>for testing device driver hardening</u>, the test mechanism comprising an intercept mechanism for intercepting device access calls from a <u>device driver under test</u> and an interface for configuring the intercept mechanism

2

" for faults to be injected in response to the device access calls according to a determined test pattern". (Emphasis added).

Independent claims 17-20 also cite similar combinations of features.

Neither of the cited references teach, disclose, or suggest the testing of device drivers or of testing device driver hardening. Applicant submits that neither of the cited references teaches or suggests the testing of device drivers. Applicant believes that the testing cited in the prior art assumes that the device drivers are operating correctly. Furthermore, Applicant submits that Splett provides no teaching, suggestion, or motivation to modify Tavllaei to test device driver hardening. For at least these reasons, Applicant submits that a case of obviousness has not been established, and therefore respectfully requests removal of the § 103(a) rejection.

CONCLUSION

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Conley, Rose, & Tayon, P.C. Deposit Account No. 501505/5181-15900/BNK.

Respectfully submitted,

_____
B. Noel Kivlin
Reg. No. 33,929
ATTORNEY FOR APPLICANT(S)

Conley, Rose & Tayon, P.C.
P.O. Box 398
Austin, TX 78767-0398
Phone: (512) 476-1400

Date: 9-6-00

4